UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CRAIG FRIEDMAN, Individually and on Behalf of All Others Similarly Situated,

Plaintiff,

16 Civ. 3912 (JMF) (JCF)

-against-

ENDO INTERNATIONAL PLC, RAJIV KANISHKA LIYANAARCHCHIE DE SILVA, SUKETU P. UPADHYAY, and PAUL CAMPANELLI,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Thomas J. Giblin dated December 14, 2016, and the accompanying Memorandum of Law, the undersigned hereby moves this Court on behalf of all Defendants, before the Honorable Jesse M. Furman in Courtroom 1105 of the United States District Court for the Southern District of New York, Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007, for an order dismissing the Third Amended Complaint with prejudice pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE FURTHER NOTICE, that in accordance with the Order entered November 30, 2016 [Dkt. 74], Lead Plaintiff's opposition submission, if any, shall be served and filed no later than January 20, 2017.

Dated: December 14, 2016

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Jeff G. Hammel
Miles N. Ruthberg
James E. Brandt
Jeff G. Hammel

885 Third Avenue New York, New York 10022 (212) 906-1200 miles.ruthberg@lw.com james.brandt@lw.com jeff.hammel@lw.com

Attorneys for Defendants Endo International PLC, Rajiv Kanishka Liyanaarchchie De Silva, Suketu P. Upadhyay and Paul Campanelli